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May 4, 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Madison River Telephone Company, Meb Tel  
Communications, and BellSouth Joint Petition for Waiver  
of the Study Area Boundary Freeze and Section 69.3(e)(11),  
CC Docket No. 96-45

Dear Ms. Dortch:

On January 27, 2005, Madison River Telephone Company (Madison River), its wholly owned subsidiary, Meb Tel Communications (MebTel), and BellSouth Telecommunications, Inc. (BellSouth) filed a Joint Petition for Waiver of the “frozen study area” rule, as codified in the Appendix-Glossary of Part 36 of the Commission’s rules, in connection with the transfer of approximately 3522 access lines in North Carolina from BellSouth to MebTel.<sup>1</sup> Additionally, MebTel also requests a waiver of Section 69.3(e)(11) of the Commission’s rules in order to continue to allow it to use NECA as its tariff pool administrator.<sup>2</sup>

These waivers are necessary to (1) enable BellSouth to delete 2 exchanges from its North Carolina study area; (2) enable MebTel to incorporate these 2 exchanges into its existing study area; and (3) enable MebTel to continue to participate in the NECA common line pool, instead of having it file its own interstate tariffs, and assume the cost and administrative burden associated with this process.

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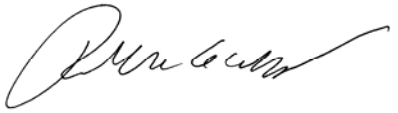
<sup>1</sup> Joint Petition for Waiver of the Definition of “Study Area” of the Appendix-Glossary of Part 36 of the Commission’s Rules, Petition for Waiver of Section 69.3(e)(11) of the Commission’s Rules, CC Docket No. 96-45, filed January 27, 2005 (*Petition*).

<sup>2</sup> *Id.* at 7.

NECA has reviewed the petition, and has no objection to inclusion of the acquired ILEC access lines in the NECA common line tariff. Inclusion of these acquired lines in NECA's tariff will create no undue administrative burden, nor will it result in any disadvantage to other tariff participants.

NECA looks forward to working with the carriers, USAC, and the Commission in implementing the tariff and data reporting changes necessary to effectuate the proposed transaction.

Sincerely,

A handwritten signature in black ink, appearing to read "Rickard A. Askoff", written in a cursive style.

Rickard A. Askoff

Cc: Gary Seigel, Wireline Competition Bureau, FCC  
David Cosson, Kraskin, Moorman, & Cosson, LLC  
Tracey Saltenberger, Dep. Gen. Counsel, NECA